March 29, 1999

Dockets Management Branch (HFA-305) Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, Maryland 20852 4743 '99 APR -8 A9 53

Re: Docket # 98N-1038, "Irradiation in the Production, Processing, and Handling of Food"

To whom it may concern:

I support the recommendation by the Center for Science in the Public Interest regarding labeling of irradiated foods: "any foods, or any foods containing ingredients that have been treated by irradiation, should be labeled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the international symbol. If the food is unpackaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale."

Like other labels, irradiation labels are required by FDA to be truthful and not misleading. I believe that the terms "treated with radiation" or "treated by irradiation" should be retained. Any phrase involving the word "pasteurization" is misleading because pasteurization is an entirely different process of rapid heating and cooling. Without labeling, there will be no way for you to know if your food has been irradiated. demanding prominent labeling, the use of the terms "irradiation" or "irradiated" and the use of the radura symbol.

I believe that the absence of a statement would be misleading because irradiation destroys vitamins and causes changes in sensory and spoilage qualities that are not obvious or expected by the consumer. At the very least, these foods should be prominently labeled, and all irradiated components of a food should be identified.

As to the kind of label used, I believe that label should be large enough to be readily visible to the consumer, on the front of the package. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura).

And last but not least, I believe that the FDA's labeling requirement should not be permitted to expire.

Yours truly,

Cilcen Tapp Eileen Kapp

cc: Senator Daniel P. Moynihan

Senator Charles Schumer

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